

## REMARKS

### I. Introduction

In response to the Office Action dated March 20, 2006, please consider the following remarks.

### II. The Cited References and the Subject Invention

#### A. The Dorfman Reference

U.S. Patent No. 5,960,164, issued September 28, 1999 to Dorfman et al. discloses a method and system for producing documents at a first site from database information produced at a second site remote from the first site. The method and system is said to have enhanced system flexibility and enhanced data handling throughput, which are accomplished by adopting standard programming interface or database tables to allow a computer at the second site to obtain information necessary to generate all necessary data codes and stream formatting information which will be utilized at the first site. An object association table, which associates document production jobs with specific documents and appropriate descriptions, is provided at the first site so that it is accessible—e.g. through an online communications network—at the second site. The object association table is accessed at the second site in realizing substantially only file names in the object association table, to produce database information at the second site. The database information is supplied from the second site to the first site where it is translated so that it may be utilized by a specific print engine at the first site, utilizing a job formatting table to build an engine specific print stream for one or more print engines. Then the engine specific print stream, tailored to the particular print engine utilized, electronically controls a specific print engine at the first site to image documents having variable information from the database information supplied from the second site.

#### B. The Shirakawa Reference

U.S. Patent No. 5,926,825, issued July 20, 1999 to Shirakawa discloses an article layout device for automatically making layout of multi-column documents. The article layout device

comprises a layout execute section which virtually sets rectangular columns on an area where documents are arranged and searches for an unused sole column or compound column until the columns are filled with articles or all articles are completely arranged to attain a layout result on articles which can be arranged; an article entry priority output section which outputs the entry priority of each article to be entered, as required; a layout result evaluation section which gives an evaluation value based on the entry priority of the article to each of a plurality of layout results determined by the layout execute section; and a best layout result retrieval section which selects the layout result having the best evaluation value given by the layout result evaluation section among the plurality of layout results determined by the layout execute section.

### III. Office Action Prior Art Rejections

The Office Action rejected claims 1-7, 9-17 and 19-33 under 35 U.S.C. § 102(b) as being anticipated by Dorfman et al., U.S. Patent No. 5,960,164 (Dorfman). Applicants respectfully traverse these rejections.

With Respect to Claim 1, 11, and 21: Claim 1 recites:

*A method of printing an impositioned document, comprising the steps of:*  
*receiving source data;*  
*receiving a job ticket generated from the source data, the job ticket having a first identifier identifying a resource of the document and layout information describing a layout of the resource in the document;*  
*generating a second identifier associated with the resource, the second identifier locally recognizable by a printing device;*  
*storing the second identifier remotely from the printing device;*  
*storing the resource locally to the printing device; and*  
*printing the stored resource according to the layout information.*

Claim 1 recites that the job ticket has:

*a first identifier identifying a resource of the document and layout information describing a layout of the resource in the document*

The Office Action argues that the Applicant's job ticket is analogous to Dorfman's Object Association Table (hereinafter, OAT):

Therefore, sending the object association table 21 to the database publisher 11' qualifies as 'receiving a job ticket generated from the source data, the job ticket having a first identifier

identifying a resource of the document and layout information describing a layout of the resource in the document.

However, the OAT does not include *layout information describing a layout of the resource in the document*. The difference is important, because that layout information's inclusion into the job ticket is one of the features that permits the Applicants' invention to efficiently print impositioned documents.

Claim 1 also recites:

*generating a second identifier associated with the resource, the second identifier locally recognizable by a printing device*

The Office Action argues that the second identifier analogous to Dorfman's "job formatting table 22" (hereinafter, JFT). The Office Action reasons that this is an identifier because it creates a "printer specific data stream," but the Applicants must disagree. The JFT is not an identifier at all ... it is a translator that

"provides a translation mechanism at a translation site to map variable data fields provided in data set 12 which is specific to the particular print engine 17, 17', and reflects engine specific parameters such as resolution and imposition, while serving to hide production specific information from the data publisher" (col. 7, lines 19 et seq.)

Claim 1 also recites the steps of:

*storing the resource locally to the printing device; and  
printing the stored resource according to the layout information.*

With regard to storing resources locally to the printing device, the Office Action argues that this is disclosed because (1) Dorfman discloses an embodiment where the "first site" corresponds to the database publisher 11" and because (2) "The first computer, providing the database which stores the resources identified by the object association table, or "job ticker" is local to the database publisher 11". The Applicants do not understand this reasoning. The cited portion of the Dorfman reference:

The invention also relates to a system for producing documents at a first site from database information produced at a second site remote from the first site. The system may comprise the following components: A first computer remote from the second site containing an object association table which associates document production jobs with specific documents and appropriate object descriptions. A specific print engine at the first site for imaging documents, and electronically controlled by a specific variable print image stream. A second

computer at the second site capable of using the object association table to produce database information containing specific file names. A third computer remote from the second site for using the database information supplied by the second computer and a job formatting table contained within the third computer for translating the database information containing specific file names from the second computer to produce a print image stream specifically for controlling the specific print engine. And, a fourth computer at the first site connected to the specific print engine utilizing the print image stream from the third computer, along with other data, to control the specific print engine to print desired documents containing variable information provided from the second computer database information. (col. 3, lines 44-66)

Does not appear to disclose storing resources locally to the printing device.

In fact, Dorfman does not disclose an embodiment wherein the "first site" corresponds to the database publisher 11". The opposite is the case. The object association table and the job formatting table are stored in sites distinct from that of the database publisher 11'. This is made clear in Dorfman as follows:

The object association table 21 and the job formatting table 22 are associated with computers which are of course distinct from the computer of the database publisher 11'. However the tables 21, 22 may be provided within the same computer housing as schematically illustrated at 24 in FIG. 2 (e.g. are parts of the same computer). (col. 6, lines 56-61)

Further, claim 1 recites that the "resource" is the object that is identified by the identifier of the first job ticket and the identifier of the second job ticket. Nothing in Dorfman discloses storing anything analogous to a "resource" locally to the printing device.

Finally, claim 1 begins by reciting the step of "receiving source data." The Office Action argues that this is disclosed by virtue of Dorfman's disclosure of "a first computer remote from the second site containing an object association table which associates document production jobs with specific documents and appropriate object descriptions." The reasoning is that "Since the first computer (24) is directly attached to the user interface (UI) and therefore, both the print command and the source document generation, this comprises receiving source data, satisfying the requirements of limitation 1."

On page 7, the Office Action acknowledges that "Dorfman does not disclose any of the operations in generating the object association table." The Applicant agrees ... Dorfman says nothing at all about how the OAT is generated or by whom. Since claim 1 indicates that the job ticket is generated from the source data, the Applicants do not understand how it can be said that Dorfman discloses this feature.

Claims 11 and 21 are patentable for the same reasons.

With Respect to Claim 2, 12, and 22: Claim 2 recites:

*The method of claim 1, wherein:  
the source data is received in a print optimizer and the second identifier is stored in the print optimizer;  
the job ticket is generated by an impositioning module.*

The Office Action argued that Dorfman's first computer (e.g. 24) is a print optimizer because it "associates resources with parameters such as Object ID, job ID, or object code."

The Applicants responded that they did not understand how association with resources fairly discloses a "print optimizer". The Office Action points to the underlined portion of the following text from the Applicants' specification:

The print optimizer 302 includes a resource checking module 320 for determining if a resource provided by the data generator 310 is already associated with an identifier and stored in the print server 306 and/or a memory 326 of the printer 308. The print optimizer 302 also includes a processing module 322 which containerizes or RIPs (rasterize and print) resources in the impositioned document to a printer-renderable form. The print optimizer 302 also maintains and manages a database 324 which associates resource identifiers with AFP identifiers such as the resource name and object ID. (Page 5 lines 23-29)

However, the underlined portion of the foregoing refers to ancillary functions of the print optimizer. In any case, nothing in the Dorfman reference discloses the generating a job ticket in an impositioning module, as recited in claim 2.

Claims 2 and 12 are patentable for the same reasons.

With Respect to Claims 9, 19, and 29: Claim 9 recites that the job ticket is augmented with variable data.

The Office Action argues that Dorfman discloses "a method of setting up a system for a data publisher to provide data for a remote imaging system to print and merge the data in signatures which are combined into a document, and where a number of documents are combined to produce a booklet." The Office Action also indicates that FIG. 4 discloses a step for determining the variable data fields in a given print job" and that this is comparable to "augmenting the job ticket with the variable data.

The Applicants respectfully disagree. Claim 9 recites that the *job ticket* is augmented with the variable data. Since the Office Action analogizes the Applicants' job ticket to Dorfman's OAT, that reasoning would require that Dorfman teach augmenting the OAT with variable data, and it does not do so.

Claims 19 and 29 are patentable for the same reasons.

With Respect to Claims 10, 20, and 30: Claim 10 recites:

*The method of claim 9, wherein the step of augmenting the job ticket with the variable data comprises the step of:*

*accepting source data having a variable data tag;  
associating the first identifier with the variable data tag;  
replacing variable data tags with variable data or a reference to the variable data; and  
augmenting the job ticket with the variable data or the reference to the variable data.*

Claim 10 recites that the job ticket is *augmented* with variable data. Since the Office Action analogizes the Applicants' job ticket to the OAT, that would mean that Dorfman must teach that the OAT is augmented with variable data. As discussed above with respect to claim 9, this is not the case.

Turning now to the steps recited in claim 10:

Claim 10 recites the step of *accepting source data having a variable data tag*. With respect to this step, the Office Action argues "First, the data is received by the computer 24, which contains the object association table 21. Thus the 'source data having a variable data tag' is accepted." The Applicants cannot determine where Dorfman discloses the acceptance of source data *having a variable data tag* and so must disagree.

The Office Action indicates that since Dorfman "specif[ies] variable data fields," it discloses the step of "associating *the* first identifier with the variable data tag." This is also not the case. Claim 1 recites that the first identifier is included with the job ticket, which the Office Action analogizes to the OAT. Plainly, Dorfman does not disclose *augmenting* the OAT by associating an identifier in the OAT with a variable data tag.

Claims 20 and 30 are patentable for the same reasons.

The Office Action rejected claims 8, 18 and 28 under U.S.C. § 103(a) as being obvious over Dorfman et al., U.S. Patent No. 5,960,164 (Dorfman) and Shirakawa, U.S. Patent 5,926,825 (Shirakawa). Claim 8 recites:

*The method of claim 1, further comprising the steps of:  
receiving a second job ticket having the first identifier and second layout information describing a  
second layout of the resource in the document;  
transforming the first identifier into the second identifier; and  
printing the stored resource according to the second layout information.*

As described above, the OAT does not have layout information. Further, a print image stream is not analogous to a second identifier. Accordingly, the Applicants traverse the rejection of claim 8.

Claims 18 and 28 are patentable for the same reasons.

#### IV. Dependent Claims

Dependent claims 2-10, 12-19, and 21-33 incorporate the limitations of their related independent claims, and are therefore patentable on this basis. In addition, these claims recite novel elements even more remote from the cited references. Accordingly, the Applicant respectfully requests that these claims be allowed as well.

V. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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G&C 156.1-US-01